



MISSOURI DEPARTMENT OF NATURAL RESOURCES

P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

October 11, 1983

Mr. Paul Trenchman, P.E.
Allgeir, Martin & Associates, Inc.
2820 Range Line
P.O. Box 2277
Joplin, MO 64803

Dear Mr. Trenchman:

This letter is in reference to your letter of September 26, 1983, concerning the status of the waste pickle liquor generated by Talbot Industries under Missouri's Hazardous Waste Management Regulations.

In discussing this matter with Betti Harris of the Environmental Protection Agency, Region VII office, it was noted that action has not been taken by EPA to exempt the pickle liquor waste under 40 CFR 261.6. However, even if this action had been taken by EPA it would not change the requirements under the Missouri Hazardous Waste Management Law and Regulations. State regulations do not have an exemption provision similar to 40 CFR 261.6. Subsection 10 CSR 25-5.010(1)(A) of the Missouri Regulations requires that all wastes defined as hazardous in 10 CSR 25-4.010 or 4.020 in the quantities specified, be registered by the generator with the Department of Natural Resources. The only exception is in section 10 CSR 25-4.010(7) which provides an exemption for wastes being reused without treatment or additional processing. We understand that the hazardous waste (pickle liquor) generated by Talbot is being treated before being used by the Joplin Municipal Waste Water Treatment Plant and is therefore not qualified for this exemption.

It is the department's interpretation that the waste pickle liquor should be re-registered. Also, the generator employee tax of \$2.00 per quarter per covered employee is applicable and was due September 30; Talbot has until October 31 to submit this payment, which is estimated in the enclosed bill.



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RCRA RECORDS CENTER

EPA-ARWM/SPRS

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Region VII, Kansas City, Missouri 64106

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director

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If there are further questions concerning the waste pickle liquor,
please feel free to contact this office.

Sincerely,



Kenneth J. Davis
Environmental Specialist
Waste Management Program

KJD:mlm

Enclosures

cc: Mr. Alex Bourne - Talbot Industries
Springfield Regional Office
Betti Harris - EPA, Region VII ✓
Carol Eighmey - Waste Management Program